

APR 25 2017

[Signature]
CLERK

KEITH L. WRIGHT, ET AL.,

PLAINTIFF.

vs.

UNITED STATES OF AMERICA, ET AL.,

FEDERAL BUREAU OF INVESTIGATIONS(F.B.I.
SPECIAL AGENT-Oscar Rameriz, F.B.I. SPECIAL
AGENT-David "Dave" Mackey),

UNITED STATES ATTORNEY GENERAL FOR SOUTH
DAKOTA(FORMER-Larry Long),

UNITED STATES ATTORNEY FOR SOUTH DAKOTA
(FORMER-Marty J. Jackley),

ASSISTANT UNITED STATES ATTORNEY FOR SOUTH
DAKOTA(FORMER-Brendan V. Johnson, FORMER-
Randolph "Randy" J. Seiler, CURRENT-Eric
Kelderman, Jeremy R. Jehangiri, Kevin
Koliner, Stephanie C. Bengford),

UNITED STATES FEDERAL PUBLIC DEFENDER FOR
SOUTH DAKOTA(FORMER-Jeffery L. Viken),

ASSISTANT UNITED STATES FEDERAL PUBLIC
DEFENDER(FORMER-Jana Miner, CURRENT-Edward
G. Albright, Robert "Bob" Overture),

CHIEF UNITED STATES DISTRICT JUDGE FOR
SOUTH DAKOTA(FORMER-Karen E. Schreier),

UNITED STATES DISTRICT JUDGE FOR SOUTH
SOUTH DAKOTA(CURRENT-Charles B. Kornmann,
Roberto A. Lange),

UNITED STATES MAGISTRATE JUDGE FOR SOUTH
DAKOTA(CURRENT-Mark Moreno, Veronica L.
Duffy),

UNITED STATES FEDERAL BUREAU OF PRISON'S

UNITED STATES MARSHALL SERVICE

UNITED STATES DEPARTMENT OF JUSTICE,

STATE OF SOUTH DAKOTA,

GOVERNOR FOR STATE OF SOUTH DAKOTA(FORMER-
Michael "Mike" Rounds, CURRENT-Dennis M.
Daugaard),

CV: 17-3011
(CR 06-30026 / CV 14-3014)
TPO NO 06-19 / CR07-49
ETC.

CRIMINAL COMPLAINT

CIVIL RIGHTS COMPLAINT
(42 U.S.C. § 1983, § 1985)

DAKOTA(FORMER-Michael "Mick" Strain), *

MELLETTE COUNTY SHERIFF OFFICE/DEPARTMENT *
(FORMER SHERIFF-Dustin Baxter, FORMER *
DEPUTIES-Justin Hooper, Fred Davis, Derris*
Waukazoo, Jesse Black Elk), *

MELLETTE COUNTY MAGISTRATE JUDGE FOR SOUTH*
DAKOTA(CURRENT-Andrea Wade), *

PRESIDING CIRCUIT JUDGE FOR SOUTH DAKOTA *
(FORMER-Lori S. Wilbur), *

CIRCUIT COURT JUDGE FOR SOUTH DAKOTA *
(FORMER-Kathleen Trandahl, James W Anderson*), *

ROSEBUD SIOUX TRIBE POLICE DEPARTMENT *

ROSEBUD SIOUX TRIBE COURTS(CHIEF JUDGE-
Sherman Marshall), *

ROSEBUD SIOUX TRIBE COUNCIL(FORMER *
PRESIDENT-Rodney Bordeaux, CURRENT *
PRESIDENT-William "Willie" Kindle), *

UNITED STATES DEPARTMENT OF INTERIOR, *

DEPARTMENT OF SOCIAL SERVICE FOR SOUTH *
DAKOTA(MISSION, SD DIVISION), *

Tiffany R.M. Leading Cloud, *

Titus J. Leading Cloud, *

Jeremy C. Leading Cloud, *

Jessica L. Wright (Crow-Running Enemy), *

Leigh A. Leading Cloud, *

Richard Roubideaux, *

Juanita M. Kilbourn, *

Sean H.D. Kilbourn, *

Peri Strain, *

Jody Callaway, *

Marvin Thin Elk, *

Patricia "Trish" Thin Elk, *

Rosé Ann Wendell,

Alvin Pahlke,

Emily Sovell,

Clarabelle Leading Cloud-Bordeaux,

Jeanette Roan Eagle-Lee,

DEFENDANTS.

I, the Plaintiff Keith L. Wright, in this case, state that the following is true to the best of my knowledge and belief. On or about the dates of November 12, 2005, to the present date of February 9, 2017, in the District of the State of South Dakota, and the Rosebud Sioux Indian Reservation in the State of South Dakota, in the United States of America, the above-named Defendants therein listed above in the Criminal Complaint did knowingly Commit and Violated the following Crime(s) of one or more or all listed below:

Code Section

Offense Description

Claim under "Bad Men Clause", Article 1 of the Fort Laramie Treaty of April 29, 1868(the 1868 Treaty) states:

If bad men among the whites, or among other people subject to the authority of the United States, shall commit any wrong upon the person or property of the Indians, the United States will, upon proof made to the agent and forward to the Commissioner of Indian Affairs at Washington City, proceed at once to cause the Offenders to be arrested and punished according to the Laws of the United States, and reimburse the injured person(s) for the loss sustained. (Lavette Elk, Plaintiff vs. The United States, Defendant).

DEPRIVATION OF RIGHTS UNDER COLOR OF Law: 18 U.S. Code § 242.

Whoever, under color of any law, statute, ordinance, regulation, or custom, willfully subjects any person in any State, Territory, Commonwealth, Possession, or District to the deprivation of any rights, privileges

or immunities secured or protected by the Constitution or laws of the United States, or to different punishments, pains, or penalties, on account of such person being an alien, or by reason of his color, or race, than are prescribed for the punishment of citizens, shall be fined under this title or imprisoned not more than one year, or both; and if bodily injury results from the acts committed in violation of this section or if such acts include the use, attempted use, or threatened use of a dangerous weapon, explosives, or fire, shall be fined under this title or imprisoned not more than ten years, or both; and if death results from the acts committed in violation of this section or if such acts include kidnapping or an attempt to kidnap, aggravated sexual abuse, or an attempt to commit aggravated sexual abuse, or an attempt to kill, shall be fined under this title, or imprisoned for any term of years or for life, or both, or may be sentenced to death.

GENOCIDE: U.S. Code; Chapter 50A; Section § 1091.

Basic Offense.--Whoever, whether in time of peace or in time of war and with the specific intent to destroy, in whole or in substantial part, a national, ethnic, racial, or religious group as such-

MISPRISON OF TREASON: Constitutional Law 442; 18 U.S. Code § 2382.

Whoever, owing allegiance to the United States and having knowledge of the commission of any treason against them, conceals and does not, as soon as may be, disclose and make known

the same to the President or to some judge of the United States, or to the governor or to some judge or justice of a particular State, is guilty of misprison of treason and shall be fined under this title or imprisoned not more than seven years, or both.

CONSPIRACY: 18 U.S.C. § 371.

If two or more persons conspire to commit any offense against the United States, or to defraud the United States, or any agency thereof in any manner or for any purpose, and one or more such persons do any act to effect the object of the conspiracy, each shall be fined under this title or imprisoned not more than five years, or both.

Compulsory Process Clause: 6th Amendment.

The Sixth Amendment guarantees the right of the accused "to have compulsory process for obtaining witnesses in his favor." The prosecutor has the power to compel witnesses to attend by using the police system at the government's disposal. Thus, the Sixth Amendment levels the playing field by allowing this same ability to the Defendant. See *Washington v. Texas*, 388 U.S. 14 (1967).

Compulsory process may be obtained by issuing a subpoena. However, if necessary, an arrest warrant may be issued to compel a witness to appear before a court in order to provide material testimony.

Confrontation Clause: 6th Amendment.

Provides that "in all criminal prosecutions, the accused shall enjoy the right...to be confronted with the witnesses against him." The Fourteenth Amendment makes the right to confrontation applicable to the states and not just the federal government. The right of confrontation is "[o]ne of the fundamental guarantees of life and liberty...long deemed so essential for

the due protection of life and liberty that it is guarded against legislative and judicial action by provisions in the Constitution of the United States and in the constitutions of most if not of all the States composing the Union.

Racketeering: 18 U.S. Code § 1961(1)

(A) any act or threat involving murder, kidnapping, gambling, arson, robbery, bribery, extortion, dealing in obscene matter,--; (B) any act which is indictable under any of the following provisions of title 18, United States Code Section 201 (relating to bribery), Section 1028 (relating to fraud and related activity in connection with identification documents), Section 1503 (relating to obstruction of justice), Section 1510 (relating to obstruction of criminal investigations), Section 1512 (relating to tampering with a witness, victim, or an informant) Section 1513 (relating to retaliating against a witness, victim, or an informant),--.

False Declaration: 18 U.S. Code § 1623.

(a) Whoever under oath (or in any declaration, certificate, verification, or statement under penalty of perjury as permitted under section 1746 of title 28, United States Code) in any proceeding before or ancillary to any court or grand jury of the United States knowingly makes any false material declaration or makes or uses any other information, including any book, paper, document, record, recording, or other material, knowing the same to contain any false material declaration, shall be fined under this title or imprisoned not more than five years, or both.

The Bane Civil Rights Act: Civil Code Section 52.1.

The Bane Act provides protection from threats, intimidation, or coercion and from attempts to interfere with someone's state or federal statutory or constitutional rights.--

Conspiracy Against Rights, 18 U.S.
Code § 241.

If two or more persons conspire to injure, oppress, threaten, or intimidate any person in any state, territory, commonwealth, possession, or District in the free exercise or enjoyment of any right or privilege secured to him by the Constitution or laws of the United States, or because of his having exercised the same; or --

Prohibition Against Retaliation and Coercion: 42 U.S. Code § 12203.

(a) Retaliation

No person shall discriminate against any individual because such individual has opposed any act or practice made unlawful by this chapter or because such individual made a charge, testified, assisted, or participated in an investigation, proceeding, or hearing under this chapter.

(b) Interference, Coercion or Intimidation

It shall be unlawful to coerce, intimidate, threaten, or interfere with any individual in the exercise or enjoyment of, or on account of his or her having exercised or enjoyed, or on account of his or her having aided or encouraged any individual in the exercise or enjoyment of, any right granted or protected by this chapter.

Due Process Clause: 5th Amendment & 6th Amendment.

The Fifth Amendment to the United States Constitution is part of the Bill of Rights and protects a person from being compelled to be a witness against themselves in a criminal case. No person shall be held to answer for a capital, or otherwise infamous crime, unless on a presentment or indictment of a Grand Jury, except in cases arising in the land or naval

forces, or in the Militia, when in actual service in time of War or public danger; nor shall any person be subject for the same offence to be twice put in jeopardy of life or limb; nor shall be compelled in any criminal case to be a witness against himself, nor be deprived of life, liberty, or property, without due process of law; nor shall private property be taken for public use, without just compensation.

The Sixth Amendment to the Constitution is the part of the United States Bill of Rights that sets forth rights related to criminal prosecutions.

The Supreme Court has applied the protections of this amendment to the states through the Due Process Clause of the Fourteenth Amendment.

In all criminal prosecutions, the accused shall enjoy the right to a speedy and public trial, by an impartial jury of the State and district wherein the crime shall have been committed, which district shall have been previously ascertained by law, and to be informed of the nature and cause of the accusation; to be confronted with the witness against him, to have compulsory process for obtaining witnesses in his favor, and to have the Assistance of Counsel for his defence.

Destruction, alteration, or false falsification of records in Federal investigations and bankruptcy: 18 U.S. Code § 1519.

Whoever knowingly alters, destroys, mutilates, conceals, covers up, falsifies or makes a false entry in any record, document, or tangible object with the intent to impede, obstruct, or influence the investigation or proper administration of any matter within the jurisdiction of any department or agency of the United States or any case

filed under title II, or in relation to or contemplation of any such matter or case, shall be fined under this title imprisoned not more than 20 years, or both.

This Criminal Complaint and Civil Rights Complaint is based on the contents involved in Plaintiff case(s). That other Charges against the Defendants listed above maybe filed in this case.

[NOTE.] I the Plaintiff, Keith L. Wright, do not have knowledge or access to the whereabouts or address of the Defendants for paperwork to be served upon them. I do not want the local, state, tribal and government officials, or individuals to accuse me of harassing, stalking and/or any such allegations next. I leave that to the Courts to have the Defendants and myself served the filed Complaint.

I respectfully submit/file this Criminal Complaint and Civil Rights Complaint without prejudice.

Dated this 9th day of February, 2017.

Keith Wright -

Keith L. Wright
#12975-073 U.S.P.
P.O. Box 24550
Tucson, AZ 85734